

KAZEROUNI LAW GROUP, APC  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

CARRIE COUSER, individually  
and on behalf of all other  
similarly situated,

Plaintiffs,

v.

COMENITY BANK,

Defendant.

Case No.: 12-CV-02484-MMA-BGS

**DECLARATION OF STEPHEN G.  
RECORDON IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
ATTORNEYS' FEES, COSTS,  
AND INCENTIVE AWARD**

**Date:** April 20, 2015

**Time:** 2:30 p.m.

**Place:** Courtroom 3A

**Judge:** Hon. Michael M. Anello

**DECLARATION OF STEPHEN G. RECORDON**

I, STEPHEN G. RECORDON, declare:

1. I regularly practice before the United States District Court for the Southern District of California, and I am familiar with the hourly rates charged by attorneys who practice in this Court.
2. I have been licensed to practice law in the State of California since 1980. I am a partner with the law firm of Recordon & Recordon. A large part of my practice focuses on consumer related issues and litigation. These cases include both individual as well as complex actions.
3. I have known attorneys Joshua B. Swigart and Abbas Kazerounian for several years, and I am also familiar with their legal work, as they and I have similar consumer law practices and practice in this federal district.
4. The hourly rate in the United States District Court for the Southern District of California for an attorney with Mr. Swigart's experience and expertise in consumer class action litigation would be in the range of \$595.00 per hour for complex litigation. Therefore, \$595.00 per hour, in my opinion, is a reasonable hourly rate and appropriate for Mr. Swigart.
5. The hourly rate in the United States District Court for the Southern District of California for an attorney with Mr. Kazerounian's experience and expertise in consumer class action litigation would be in the range of \$560.00 per hour in this type of complex litigation. Therefore, \$560.00 per hour, in my opinion, is a reasonable hourly rate and appropriate for Mr. Kazerounian.

I declare under penalty of perjury that the foregoing is true and correct.  
 Executed on January 8, 2015, pursuant to the laws of the United States and the State of California, at San Diego, California.

By: 

STEPHEN G. RECORDON